

1 ROBERT W. FREEMAN  
Nevada Bar No. 03062  
2 [Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)  
CHERYL A. GRAMES  
3 Nevada Bar No. 12752  
[Cheryl.Grames@lewisbrisbois.com](mailto:Cheryl.Grames@lewisbrisbois.com)  
4 LEWIS BRISBOIS BISGAARD & SMITH LLP  
6385 S. Rainbow Boulevard, Suite 600  
5 Las Vegas, Nevada 89118  
TEL: 702.893.3383  
6 FAX: 02.893.3789  
*Attorneys for Defendant*  
7 *Curt H. Sundell, Jr.*

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA, NORTHERN DIVISION

10 \*\*\*

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 vs.  
14 CURT H. SUNDELL, JR.  
15 Defendants.  
16

CASE NO. 3:18-cv-0215-HDM-VPC

**JOINT STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE A  
RESPONSE TO PLAINTIFF'S  
COMPLAINT (ECF NO. 1)  
(SECOND REQUEST)**

17 COME NOW the parties, by and through their undersigned counsel of record, and hereby  
18 stipulate and agree that the time for Defendant to file his response to Plaintiff's Complaint (ECF  
19 No. 1), said response being due on July 6, 2018 (*See* ECF No. 6), be extended until August 6,  
20 2018.

21 **Reason for Extension**

22 Due to the complexity of the claims and issues alleged in Plaintiff's Complaint, Defendant  
23 continues to need additional time to file a response to Plaintiff's Complaint. Additionally, the  
24 parties are in settlement discussions, which, if successful, would obviate the need for Defendant to  
25 respond to the Complaint.

26 ///

27 ///

28 ///

1 This stipulation is made in good faith and not for the purpose of unnecessarily delaying  
2 these proceedings. This is the second extension of time requested by counsel for filing  
3 Defendant's response to Plaintiff's Complaint.

4 Dated this 5<sup>th</sup> day of July 2018.

Dated this 5<sup>th</sup> day of July 2018.

5 LEWIS BRISBOIS BISGAARD & SMITH LLP

U.S. ATTORNEY'S OFFICE - DISTRICT OF  
NEVADA

6 /s/ Cheryl A. Grames

/s/ Holly A. Vance

7 Robert W. Freeman, Esq.

David Elieson, Esq.

Nevada Bar No. 03062

Holly A. Vance, Esq.

8 Cheryl A. Grames, Esq.

Bruce R. Thompson Federal Building and U.S.

Nevada Bar No. 12752

Courthouse, District of Nevada

9 6385 S. Rainbow Blvd., Suite 600

400 South Virginia Street, Ste. 900

Las Vegas, Nevada 89118

Reno, Nevada 89501

10 Attorneys for Defendant

Attorneys for Plaintiff

11  
12 ORDER

13 IT IS SO ORDERED.

14 Dated this 11<sup>th</sup> day of July, 2018.

15  
16  
17 United States Magistrate Judge  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28